

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

VLADISLAV KLYUSHIN  
Defendant

CRIMINAL NO. 21-cr-10104-PBS

**ASSENTED-TO MOTION TO CONTINUE MOTION FILING AND RESPONSE DATES  
BY ONE WEEK**

Now comes the Defendant, Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully moves this Honorable Court to continue the motion filing deadline of September 13, 2022, and the government's response date of September 27, 2022, by one week.

On August 30, 2022, this Honorable Court set a September 13, 2022, deadline for the filing of the Mr. Klyushin's Motions to Suppress and to Dismiss, *see* Dkt. 83. Since that date, one of Mr. Klyushin's attorneys was diagnosed with COVID-19 and is presently recovering from the illness. Additionally, the defense learned that it is the Court's intention to continue the October 11, 2022, trial date, which would alleviate any concerns regarding the timing of the motions and responses. Dkt. 84. Accordingly, with the assent of the Government, the defense respectfully requests this Honorable Court to extend the motion filing deadline to September 20, 2022, and the Government's response date to October 4, 2023.

**WHEREFORE**, the defense respectfully requests that this motion be granted.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The undersigned counsel has conferred with the Government, who by and through AUSAs Seth Kosto and Stephen Frank, assent to this request.

Respectfully Submitted,  
Vladislav Klyushin,  
By His Attorney,

**/s/ Maksim Nemtsev**  
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Dated: September 9, 2022

**CERTIFICATE OF SERVICE**

I, Maksim Nemtsev, hereby certify that on this date, September 9, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

**/s/ Maksim Nemtsev**  
Maksim Nemtsev, Esq.